

## REMARKS

The Examiner is thanked for the performance of a thorough search and for providing a response to Applicant's arguments filed on October 10, 2007. Claims 1, 5, 11, 14, 18, 24, 28, 34 and 38 have been amended. No claims have been canceled, added, or withdrawn. No new matter has been added. Therefore, Claims 1-43 are pending in the application.

### CLAIM REJECTIONS – 35 U.S.C. § 102(e) AND 35 U.S.C. § 103(a)

Claims 1, 4, 11, 14, 17, 24, and 37 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by US 2003/0037128 ("Beadles"). This rejection is respectfully traversed.

Claim 34 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Beadles* in view of US 6,957,256 ("Bradley"). This rejection is respectfully traversed.

The remaining claims not listed above are dependent claims that depend on one of independent claims 1, 11, 14, 17, 24, and 34. These remaining claims stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over the combination of *Beadles* and at least one other reference. These rejections are respectfully traversed.

### AMENDMENTS TO THE CLAIMS ARE FULLY SUPPORTED

Present Claim 1 recites:

A method of processing a network device operating system operation, the method comprising the computer-implemented steps of:

receiving, from each of several network device operating system components, callback registration information that indicates the network device operating system operations supported by the network device operating system component and that establishes a callback for providing a network device operating system operation and associated data to the network device operating system component;  
receiving the network device operating system operation and associated data within an Extensible Markup Language (XML) document;  
parsing the XML document to identify the network device operating system operation;  
selecting one of the several network device operating system components that can process the identified network device operating system operation, where the callback registration information received from the selected one of several network device operating system components indicates that the identified network device operating system operation is supported by the selected one of several network device operating system components;

preparing the associated data for use by the selected one of several network device operating system components; and  
providing the identified network device operating system operation and the prepared data in the callback to the selected one of the several network device operating system components that was established by the callback registration information received from the selected one of several network device operating system components.

Claim 1 has been amended to more fully clarify the claimed invention. Support for the amendments can be found throughout the specification including at least in paragraphs 25-30 (describing registration of the network device operating system component with the programmatic agent), paragraph 40 (describing that the programmatic agent is able to determine, based on the registration information provided by the components, which components support objects that are implicated by an operation), and paragraph 42 (describing providing the operation and associated data to the component using the callback established when the component registered with the programmatic agent). Therefore, no new matter is added by these amendments and the amendments are fully supported by the specification.

Independent Claims 11, 14, 17, 24, and 34 are amended to recite limitations similar to Claim 1. Therefore, the amendments to these claims are also fully supported by the specification.

Claims 5, 18, 28, and 38 are amended to correct an informality. These amendments do not raise any new issues regarding adequate support in the specification for the amendments.

**AMENDMENTS PLACE THE PENDING CLAIMS IN CONDITION FOR ALLOWANCE  
AND SHOULD BE ENTERED**

In the Final Office Action mailed December 28, 2007 the Examiner invites Applicant to amend the claims to more fully clarify the claimed invention. (*See Office Action*, page 19). Specifically, the Office Action suggests that Applicant amend the claims to “clearly claim that the callback is directed to sending information back to the network device operating system component after an initial communication has taken place.” *Beadles* does not teach or suggest

the following limitations of Claim 1 which relate to providing information to a selected component in a callback that was earlier established by receiving registration information from the selected component.

**receiving, from each of several network device operating system components, callback registration information that indicates the network device operating system operations supported by the network device operating system component and that establishes a callback for providing a network device operating system operation and associated data to the network device operating system component;**  
...  
**providing the identified network device operating system operation and the prepared data in the callback to the selected one of the several network device operating system components that was established by the callback registration information received from the selected one of several network device operating system components.**

As a preliminary matter, it should be noted that the edge devices in *Beadles* differ from network device operating system components of Claim 1 by the manner in which they make their configuration interface known. Specifically, Claim 1 recites “receiving, from each of several network device operating system components, callback registration information … that establishes a callback for providing a network device operating system operation and associated data to the network device operating system component”. Thus, to qualify as the network device operating system component of Claim 1, a component must send information that establishes, with the thing that receives the information, a callback for providing an operation and associated data to the component.

In contrast, the edge devices in *Beadles* send only “events” to “device plug-ins” in order to “initiate the request for policy”. (*Beadles*, paragraph 48). Clearly, an event notifying of a need for policy does not establish a callback for providing the policy. In fact, the policy in *Beadles* is provided to the edge devices via a pre-defined, well-known interface (i.e., COM on Windows edge devices or Command Line Interface (CLI) and Trivial File Transfer Protocol (TFTP) on Cisco edge devices). (*See Beadles*, paragraphs 54-62). Thus, *Beadles* cannot

possibly satisfy the any of the following limitations, each of which requires a component that establishes a callback by sending information to the thing that provides configuration information to the component via the callback:

- receiving, from each of several network device operating system components, callback registration information that indicates the network device operating system operations supported by the network device operating system component and that establishes a callback for providing a network device operating system operation and associated data to the network device operating system component;
- ...
  - providing the identified network device operating system operation and the prepared data in the callback to the selected one of the several network device operating system components that was established by the callback registration information received from the selected one of several network device operating system components.

In *Beadles*, configuration policy is provided to the edge devices via a “pull-model” mechanism or a “push-model” mechanism. (See *Beadles*, paragraph 48). In the push model, “the plug-in receives an event, fetches the policy, translates it into a format supported by the edge device and then delivers the policy to the edge device”. The pull model is implemented similarly except that the event received by the plug-in is sent from the edge device. In other words, *Beadles* teaches delivering configuration policy to the edge device.

The mechanism in *Beadles* for delivering the configuration policy varies depending on the type of edge device. However, in all cases configuration policy is delivered to the edge device via pre-defined, well-known interface accessible to the device plug-in. In case of Windows type edge devices, the interface is a pre-defined, well-known COM interface. (See *Beadles*, paragraph 54-56). In case of Cisco type edge devices, the interface is a pre-defined, well-known Command Level Interface (CLI). (See *Beadles*, paragraph 61). Stated another way, the device plug-in of *Beadles* contains hard-coded logic for providing configuration policy to the edge devices and use registration information from the edge devices to provide configuration policy to the edge devices.

CLAIM 1

In making the rejection of Claim 1, the Office Action appears to equate providing an operation and associated data in a callback recited in Claim 1 with *Beadles*' delivering configuration policy to the edge devices. However, in *Beadles*, the configuration policy is delivered to the edge devices without the edge devices first providing callback registration information to the device plug-ins. Therefore, *Beadles* does not disclose or in any way suggest a situation in which an operation and associated data are provided in a callback to a component that previously established the callback by sending registration information to the thing that is now providing the operation and data via the established callback. Consequently, *Beadles* does not disclose or in any way suggest:

providing the identified network device operating system operation and the prepared data in the callback to the selected one of the several network device operating system components that was established by the callback registration information received from the selected one of several network device operating system components.

In addition, it does not make sense to say that *Beadles* satisfies the following limitation, because, as mentioned above, the edge devices in *Beadles* do not send registration information to the device plug-ins, let alone registration information that indicates the operations supported by the edge devices.

selecting one of the several network device operating system components that can process the identified network device operating system operation, where the callback registration information received from the selected one of several network device operating system components indicates that the identified network device operating system operation is supported by the selected one of several network device operating system components;

For these reasons, it is respectfully submitted that Claim 1 is allowable over *Beadles*.

Claims 11, 14, 17, and 34 have similar limitations, and are allowable for the same reasons.

Applicant respectfully requests entry of the amendments and allowance of the pending claims.

#### CLAIM 34

Claim 34 contains similar limitations to those recited in Claim 1. Therefore, Claim 34 is allowable for the same reasons that Claim 1 is allowable. Further, the Office Action relies on *Bradley* solely to teach “a network interface that is coupled to a data network for receiving one or more packet flows, a processor, and one or more stored sequences of instructions”, and *Bradley* does not overcome the deficiencies of *Beadles*. Consequently, any combination of *Beadles* and *Bradley* fails to teach or suggest all the limitations of Claim 34. Thus, Claim 34 is allowable over the combination of *Beadles* and *Bradley*.

#### REMAINING CLAIMS

The pending claims not discussed so far are defendant claims that depend on an independent claim that is discussed above. Because each defendant claim includes the features of claims upon which they depend, the defendant claims are patentable for at least those reasons the claims upon which the defendant claims depend are patentable. Removal of the rejections with respect to the defendant claims and allowance of the defendant claims is respectfully requested. In addition, the dependent claims introduce additional features that independently render them patentable. Due to the fundamental differences already identified, a separate discussion of those features is not included at this time.

#### CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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